

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS EMILY R. ROSENBERG
(APWU/USPS-T3-31)
(April 6, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories which seek information relevant to the rebuttal testimony of the APWU to United States Postal Service witness Emily R. Rosenberg (USPS-T-3). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T3-31 Please refer to your response to POIR 5 Question 4. The workbook "POIR 5 Q4 Attachment.xls" filed as your response to POIR 5 Question 4 identifies 121 post-network-rationalization Outgoing Priority facilities. Of these 121, 16 are NDCs. The workbook also identifies 120 post-network-rationalization Incoming Priority facilities, of which 7 are NDCs.

- a) Please identify all NDCs which conducted Outgoing Priority processing during FY 2010.
- b) Please identify the subset of the 16 post-network-rationalization NDCs that also did Outgoing Priority processing during FY 2010.
- c) Please identify all NDCs which conducted Incoming Priority processing during FY 2010.
- d) Please identify the subset of the 7 post-network-rationalization NDCs that also did Incoming Priority processing during FY 2010.